

EPA Reg. No. 49784-4
Vol. 3

Material to be added to an e-Jacket/Jacket

Reg. No. 49784-4

Description: Notification PER PRN 98-10

1. ☐ Placement within the e-Jacket/jacket:
- ☐ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☒ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: REGINA Foushee-Smith

Phone: 605-0780 Division: RD

Date: _____

TABLE A. Registration Changes Described in this PR Notice (Applicable section of this notice is in parenthesis).

TYPE OF CHANGE	NOTIFICATION	NON-NOTIFICATION	ACCELERATED REVIEW	AMENDMENT
LABEL OR PACKAGE				
Brand Name	All brand names (II.A.)			
Add/Delete Pests	Non-Public Health Pests (II.B.)			Public Health Pests, Termites and Quarantined Pests
Add Indoor, Non-Food Use Sites	Antimicrobials only (II.C.)			Indoor, Food and all Outdoor Uses
Advisory Statements	(II.D.)			
Packaging & Related Labeling	(II.E.)			
Use Deletions	(II.F.)			
Storage and Disposal Statements	(II.G)			
Symbols or Graphics	(II.H.)			Explanatory text requires amendment
Redundant Statements	(II.I.)			
Warranty Statements	(II.J.)			
Product Category	(II.K.1.)			
Source of Ingredients	(II.K.2.)			

Decision Information for 49784-4

Decision Seq: 429785 Action Code: 332,NOTIFICATION,30

Decision Status

FFS Start Date: Tentative Ind: No FFS Original Decision: ...

Tracking

Due Date: 26-Mar-2010 75-Day Due Date: FFS EUP Decision: ...

Create Resubmission

OPP Target Due Dt: FFS Primary Decision: ...

FFS Letters

Negotiated Due Dt: Start/Stop Clock: FQPA Clock: ...

Waiver Decision

Registrant: Response Due Date: Days Elapsed: ...

Action Code History

Current Status: PENDING (12-Mar-2010)

Decision Comments	Payment	Unmatched Paymentz	75 Day Letters
Meetings & Milestones	FFS Information	FFS Negotiated Due Dates	OPP Target Due Date
Decision Ownership	Receipts	Data Package	Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S:869241	Foushee-Smith, Regina	49784-4	26-Mar-2010	PENDING

Notification per PRN 98-10 to add an alternate brand name



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 17 2010

Ms. Heather R. Bjornson
Research Laboratories, Inc.
P.O. Box 801854
Houston, TX 77280-1854

Subject: Label Notification(s) to add an alternate brand name
Per PR-Notice 98-10

Dear Ms. Bjornson:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 98-10 dated February 23, 2010 for the following product(s):

Ritter's Flea and Tick Spray (EPA Reg. No. 49784-4)

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,

A handwritten signature in black ink, which appears to read "Richard J. Gebken", is written over a horizontal line.

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Richard Gebken
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

February 23, 2010

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 49784-4)

Notification per PR Notice 98-10

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Mr. Gebken:

Technology Sciences Group inc., on behalf of Research Laboratories, Inc., is submitting the enclosed notification to add an alternate brand name.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Research Laboratories, Inc.

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754

E-mail tsg@tsgusa.com

<http://www.tsgusa.com>

6



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 49784-4	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Research Laboratories, Inc. PO Box 801854 Houston, TX 77280-1854 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg. No. _____ Product Name MAR 17 2010	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This notification is to add an alternate brand name to the label per PR Notice 98-t0.

This notification is consistent with the provisions of PR Notice 98-t0 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling of the Confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-t0 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.		Title Regulatory Agent	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Agent for Research Laboratories, Inc.	
4. Typed Name Heather R. Bjornson		5. Date February 23, 2010	

NOTIFICATION

MAR 17 2010

Ritter's Flea & Tick Spray

[Alternate Brand Name: "ACTION" Flea & Fly Spray]

FOR CATS – KITTENS – DOGS - PUPPIES - DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats Over 12 Weeks Old, and
Horses

For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl Butoxide, Technical.....1.50%
**(N-octyl bicycloheptene dicarboximide).....0.50%
*** (Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:97.35%
Total:.....100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ester and 0.30% related compounds

**MGK® 264 Insecticide Synergist

***MGK® Repellant 326

**** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

CAUTION Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 49784-4

EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Research Laboratories, Inc.
PO Box 801854
Houston, TX 77280-1854

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-424-9300 or the National Pesticide Information Center at 1-800-858-7378.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

CAUTION: Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made of waterproof material. Users should wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use and additional precautions and use restrictions.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES.

Read and follow all directions and precautions on this product label.

General Precautions and Use Restrictions

- Apply this product only as specified on this label.
- **DO NOT** apply this product around electrical equipment due to the possibility of shock hazard.
- Except when applying directly to pets, **DO NOT** allow adults, children or pets to enter treated area until sprays have dried.
- Remove pets, birds and cover fish aquariums before spraying.
- **DO NOT** apply to pets less than 12 weeks old.
- Avoid spraying of genital areas.
- **DO NOT** apply over cuts, wounds, or irritated skin.
- **DO NOT** apply near eyes and mouth. Apply sparingly around ears.
- **DO NOT** use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using **ANY** pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Dogs and Cats: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing with legs last and paying special attention to the footpads (between toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week.

Puppies and Kittens: Do not use On puppies or kittens under 12 weeks old.

Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects.

Pet's Indoor Sleeping Quarters:

Do not contaminate water, food or feed by use of this product.

For use in companion animal quarters only. Do not broadcast outdoors.

Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy.

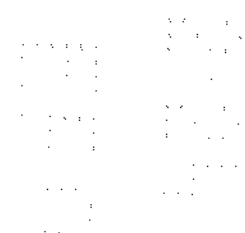
Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store in original container, in a cool, dry place, inaccessible to children and pets. If a leaky container must be contained within another, mark the outer container to identify the contents. Do not store near heat or open flame. Store pesticides away from food, pet food, seed, fertilizers and veterinary supplies.

Pesticide Disposal: Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.





United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

49784-4

Distributor Company Number

82471

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

RITTER'S FLEA & TICK SPRAY

Distributor Product Name

QUICK DROP FLEA AND FLY SPRAY

Name and Address of Distributor (Type; include ZIP code)

COASTAL AGRICULTURAL SUPPLY, INC.
 1908 NORTH KING STREET
 SEGUIN, TEXAS 78155

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

X Sam Suttan, Gen Mgr.

Date

X 8/25/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

X A. Brady Jones, PRESIDENT

Date

8/21/09

DATE OUT: 23/MAR/09

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 363203

REG./FILE SYMBOL NO.: 9468-31

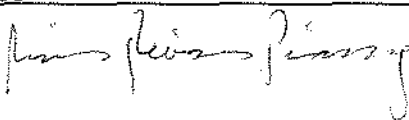
PRODUCT NAME: Ritter's Flea and Tick Spray

MRID NO: 476933-01

COMPANY NAME: Ritter Chemical LLC

ACTION CODE: 675

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508P)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

With this re-submission, the registrant has provided additional product chemistry data pertaining to the Storage Stability (GRN 830.6317) and Corrosion Characteristics (GRN 830.6320), in support of the reregistration of Ritter's Flea and Tick Spray, EPA Reg. No. 9468-31.

FINDINGS:

1. The one-year, room-temperature Storage Stability study was conducted in compliance with the Good Laboratory Practice Standards (GLPS). One container of the subject product was tested for active ingredients content at an initial (zero time) assay and after 3, 6, 9, and 12 months at $25 \pm 2^\circ\text{C}$. All of the HPLC methods described above were used to determine the percentage of each active ingredient at each time point. In addition, the product material and sample container were visually examined for physical changes from the initial sample. Results are summarized below:

Active Ingredient	Label Claim	% Active Ingredient (ave.)				
		Initial	3-month	6-month	9-month	12-month
Pyrethrin	0.15%	0.164	0.171	0.170	0.173	0.172
PBO	1.50%	1.570	1.520	1.421	1.530	1.500
MGK-264	0.50%	0.508	0.465	0.480	0.488	0.517
MGK-326	0.50%	0.508	0.483	0.500	0.505	0.508

No degradation of active ingredients occurred (no additional or unusual peaks) in any of the assays at the 3, 6, 9, or 12 month periods. Further, no changes were observed in either the sample or the container throughout the study.

2. The active ingredient statement on the label is acceptable in accordance with PR Notice 91-2 and 40 CFR 158.155. There are no data present that trigger the heading "Physical or Chemical Hazards" on the label. The Storage and Disposal statements are acceptable in accordance with 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The submitted Storage Stability and Corrosion Characteristics data satisfy GRNs 830.6317 and 830.6320, respectively. The registrant has now satisfied the MGK-326 product chemistry data requirements for the reregistration of the subject product.



Environmental Protection Agency

Office of Pesticide Programs (7505C)

Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

49784-4

Distributor Company Number

12281

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Ritter's Flea & Tick Spray

Distributor Product Name

No-Bite Flea & Tick Mist

Name and Address of Distributor (Type; include ZIP code)

DURVET, INC.
100 S.E. MAGELLAN DRIVE
BLUE SPRINGS, MO 64014

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Marketing Manager

Date

8/17/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

PRESIDENT

Date

8/21/09

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

49784-4

Reg. No. 9468-31

4 A 2 2

Send to SIG: check box ☐

This material is:

- ☐ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label

Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: _____

Phone: _____ Division: _____

Date: _____

PRODUCT REREGISTRATION
SUPPORTING DOCUMENTATION
FOR

Case Name: MGK 326

Reg. No. 946831

This supporting documentation (in chronological order) includes:

- Old labels (identified as "Superseded by label dated xx/xx/xx")
- Unacceptable CSFs (marked "Not Acceptable" and dated)
- Product chemistry reviews
- Acute Toxicity reviews
- Efficacy reviews (if necessary)
- 90-day responses to PDCI (Form A and Form B)
- Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- Correspondence

7008 2810 0001 2890 6912

U.S. Postal Service TM		
CERTIFIED MAILTM RECEIPT		
(Domestic Mail Only. No Insurance Coverage Provided)		
For delivery information visit our website at www.usps.com		
OFFICIAL USE		
Postage	\$	EPA Reg. NO.
Certified Fee		9468-31
Return Receipt Fee (Endorsement Required)		MCK Rereg. <small>Postmark Here</small>
Restricted Delivery Fee (Endorsement Required)		B. Briscoe
		6/10/09
Total Postage & Fees	\$	
Sent To Heather R. Bjornson		
Regulatory agent for Ritter Chemical		
Street, Apt. No.:		
or PO Box No. 1150 18th St. NW Suite 1000		
City, State, ZIP+4		
Washington, D.C. 20036		
PS Form 3800, August 2006 See Reverse for Instructions		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 10 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group, Inc.
1150 18th Street N.W. Suite 1000
Washington, D.C. 20036

**SUBJECT: MGK Reregistration Eligibility Decision (RED) Review of Acute Toxicity Data,
EPA Registration Number 9468-31**

Dear Ms. Bjornson:

Your submission of product chemistry data in response to the MGK-326 RED, Product Specific Data Call-In Notice has been reviewed. The Agency has determined that the Storage Stability/Corrosion Characteristics study (MRID Number 47693301) is acceptable. The product chemistry data requirements for the reregistration of EPA Registration Number 9468-31 are satisfied.

A detailed copy of the Data Evaluation Record is enclosed. If you have questions regarding this letter, you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

A handwritten signature in cursive script that reads "Patricia L. Moe".

Patricia L. Moe, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 10 2009

Heather R. Bjornson
Regulatory Agent for Ritter Chemical
Technology Sciences Group, Inc.
1150 18th Street N.W. Suite 1000
Washington, D.C. 20036

SUBJECT: MGK Reregistration Eligibility Decision (RED) Review of Acute Toxicity Data,
EPA Registration Number 9468-31

Dear Ms. Bjornson:

Your submission of product chemistry data in response to the MGK-326 RED, Product Specific Data Call-In Notice has been reviewed. The Agency has determined that the Storage Stability/Corrosion Characteristics study (MRID Number 47693301) is acceptable. The product chemistry data requirements for the reregistration of EPA Registration Number 9468-31 are satisfied.

A detailed copy of the Data Evaluation Record is enclosed. If you have questions regarding this letter, you may contact Barbara Briscoe at 703-308-8177.

Sincerely,

Patricia L. Moe, Chief
Product Reregistration Branch
Special Review and Reregistration Division

Enclosure

CONCURRENCES							
7508P	7508P						
Briscoe	<i>[Signature]</i>						
5-29-09	5/29/09						

EPA FORM 1320-1A (1/90)

Material to be added to an e-Jacket/Jacket

4A22

Reg. No. 49784-4

Description: correspondence for reregistration for Ritter's Flea and Tick Spray (MGK 326 RED)

1. ☐ Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☐ Notification

☐ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Clayton Myers

Phone: 347-8874 Division: RD-IB

Date: May 26, 2009

Decision Information for 49784-4

Decision Seq:	356496	Action Code:	75, Product Reregistration Decision; 0	...	Decision Status	
FFS Start Date:		Tentative Ind:	No	FFS Original Decision:	...	Tracking
Due Date:		75-Day Due Date:		FFS EUP Decision:	...	Create Resubmission
OPP Target Due Dt:				FFS Primary Decision:	...	FFS Letters
Negotiated Due Dt:				Start/Stop Clock:	FQPA Clock:	...
Registrant				Days Elapsed:		...
Response Due Date:						Action Code History
Current Status:						PENDING (21-Apr-2009)

Decision Comments	Payment	Unmatched Payments	75 Day Letters
Meetings & Milestones	FFS Information	FFS Negotiated Due Dates	OPP Target Due Date
Decision Ownership	Receipts	Data Package	Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S:850539	Myers, Clayton	49784-4	12-May-2009	PENDING
Response to Agency letter of 4/21/2009				
S:848813	Myers, Clayton	49784-4	21-Apr-2009	OBJECTION - DATA + LABEL DE
Needs Revision to CSF and label				
S:796362	Briscoe, Barbara	49784-4	29-Jun-2006	NO REPLY NECESSARY
8 month response				
S:796361	Briscoe, Barbara	49784-4	20-Jun-2006	PRODUCT REREGISTRATION TO

Viewing Record 1 of 1

7007 2680 0002 8138 1979

U.S. Postal Service
CERTIFIED MAILTM RECEIPT
 (Domestic Mail Only - No Insurance Coverage Provided)
 For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here
Reg #
49784-4

Sent To
Von S. Wells, Research Laboratories, Inc.
 Street, Apt. No.,
 or PO Box No. *P.O. Box 801854*
 City, State, ZIP+4
Houston, TX 77280-1894

PS Form 3800, August 2008 See Reverse for Instructions
Certified Mail: 7007 2680 0002 8138 1979

ENVIRONMENTAL PROTECTION AGENCY
 WASHINGTON, D.C. 20460

OFFICE OF
 PREVENTION, PESTICIDES
 AND TOXIC SUBSTANCES

April 21, 2009

Subject: Reregistration deficiencies in association with the active ingredient MGK[®] 326
Product Name: Ritter's Flea and Tick Spray
EPA Reg. No.: 49784-4 (formerly 9468-31)
Date of Submission: October 20, 2008

Dear Mr. Wells;

The labeling and CSF (Confidential Statement of Formula) referred to above, submitted in connection with reregistration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable for the reasons given below.

Product Confidential Statement of Formula (CSF) deficiency:

1. The Agency as part of the MGK[®] 326 reregistration risk mitigation process required MGK (McLaughlin Gormley King Co.) to limit the production and distribution of MGK[®] Repellent 326 for personal insect repellents to 20,000 lbs of a.i. per year. To assist MGK to meet these production and distribution limits, the Agency registered an additional new MGK[®] 326 technical (EPA Reg. No. 1021-1860) *MGK[®] Repellent 326, II*. (Copy attached). As a formulator using this active ingredient, you must provide a new acceptable CSF (Confidential Statement of Formula) for all formulations of the Ritter's Flea and Tick Spray (EPA Reg. No. 49784-4), which identifies 1021-1860 as the source of MGK[®] 326 in the formulation. Continued use of the previous MGK[®] 326 (EPA Reg. No. 1021-461), would constitute a misuse, since the product is only for formulation into insect repellents applied to human skin. The specifics of this change can be found within the RED on page vii.
http://www.epa.gov/oppsrrd1/REDs/mgk_326_red.pdf).

Label Deficiencies:

2. Revise to include the new EPA Reg. No. (49784-4 replacing 9468-31), new EPA Establishment Number (if it has changed) and the current Company Name and Address (Research Laboratories, Inc. replacing Ritter Chemical LLC).
3. Revise the signal word from "WARNING" to "CAUTION."

4. Revise the **FIRST AID** statements by reordering the statements according to the toxicity rankings per the acute toxicity review as follows:

1. "IF SWALLOWED . . ."
2. "IF ON SKIN OR CLOTHING . . ."
3. "IF IN EYES . . ."
4. "IF INHALED . . ."

5. Revise the **HAZARD TO HUMANS AND DOMESTIC ANIMALS** statement as follows:

"CAUTION

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made of waterproof material. User should wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco."

6. Revise the **DIRECTIONS FOR USE** statement as follows:

Revise the typographical error in bullet point 8 of the **GENERAL PRECAUTIONS AND USE RESTRICTIONS** statement by changing "pregnany" to "pregnant."

Also, add the following statement: "Do not apply over cuts, wounds, or irritated skin. Do not apply near eyes and mouth. Apply sparingly around ears."

Also, revise the "**PET'S SLEEPING QUARTERS**" statement to read "**PET'S INDOOR SLEEPING QUARTERS**"

Also, add the following statements to the **PET'S INDOOR SLEEPING QUARTERS** statement: "Do not contaminate water, food or feed by use of this product."

7. Revise the **STORAGE AND DISPOSAL** statements as follows:

"PESTICIDE STORAGE: Store in original container in a cool, dry place, inaccessible to children and pets. If a leaky container must be contained within another, mark the outer container to identify the contents. Do not store near heat or open flame. Store pesticides away from food, pet food, seed, fertilizers, and veterinary supplies.

PESTICIDE DISPOSAL: Do not reuse or refill this container. If Empty: Place in trash or offer for recycling if available. If partly filled: call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain."

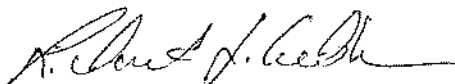
Research Laboratories, Inc. should note that a notice of availability of EPA's reregistration eligibility decision (RED) document for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number

143, Pages 42387-42389). EPA's RED for products containing MGK® 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing piperonyl butoxide, pyrethrins, and/or MGK® 264.

Within 45 days of the date of this letter, Research Laboratories, Inc. must provide a new CSF and a revised label to correct the deficiencies outlined above, so that the Agency can continue with the reregistration review for the aforementioned product.

If you have any questions, you may contact Clayton Myers, at (703) 347-8874.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken", written in a cursive style.

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosures

1021-1860

09/10/2007

1/3



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Reg. Number:

1021-1860

Date of Issuance:

SEP 10 2007

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance: conditional

Name of Pesticide Product:

MGK Repellent 326, II

Name and Address of Registrant (include ZIP Code):

Julie Schlekau
McLaughlin Gormley King Company
8810 Tenth Avenue North
Minneapolis, MN 55427

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) and (B) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Submit the following data:
Submit samples and a copy of the analytical enforcement method to the address specified in the product chemistry review (attached).
3. You make the following label changes:
Change the registration number to 1021-1860.
4. The confidential statement of formula dated 8/23/07 is acceptable and has been placed in the file jacket for this registration.

Submit two copies of the revised final printed label for the record. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

Signature of Approving Official:

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

Date:

SEP 10 2007

MGK®McLAUGHLIN
GORMLEY
KING COMPANY

MGK® Repellent 326, II

8810 Tenth Avenue N. / Minneapolis, Minnesota 55427-4319 U.S.A. • Telephone (763) 544-0341

Only for Formulation Into an Insect Repellent for the Following Use(s)
Indoor Residential and Indoor Non-Food Areas

ACTIVE INGREDIENT:

Di-n-propyl isocinchomeronate..... 99.00%

OTHER INGREDIENTS..... 1.00%

100.00%

* MGK® Repellent 326, II

MGK® - Registered trademark of McLaughlin Gormley King Company

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or a doctor. Do not give anything by mouth to an unconscious person.
IF IN EYES:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing eyes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information regarding medical emergencies or pesticide incidents, call 888-740-8712.	

Net Contents _____

Manufactured by:

McLAUGHLIN GORMLEY KING COMPANY

8810 Tenth Avenue North

Minneapolis, MN 55427

EPA Reg. No. 1021-Pending

Made in U.S.A.

EPA Est. No. 1021-MN-2

ACCEPTED
with COMMENTS
In EPA Letter Dated:

SEP 10 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
1021-1860PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**CAUTION**

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Remove and wash contaminated clothing before reuse. Wear protective eyewear.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product
in a manner inconsistent with its labeling.

Only for formulation into an insect repellent for the following use(s): indoor residential and indoor non-food areas.

This product may not be used to formulate products for the following uses: 1) food producing livestock - direct applications to meat and dairy animals, treatment of occupied premises or when animal food or feed is present; 2) growing crops - edible crops and pre- and post-harvest sprays; 3) fumigated commodities; 4) aquatic uses; and 5) human repellents.

NOTE: MGK Repellent 326 may crystallize from exposure to temperatures below 70°F during shipment or storage. The drum may be filled with crystals or a layer of darker liquid over crystals. Warm drum gently to reliquify. Agitation and probing during warming will speed liquification. Do not heat above 120°F. Do not hold at elevated temperatures any longer than necessary. Agitate drum thoroughly before use. Mix well in drum before sampling and each use.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such use(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a cool, dry place. Keep container closed.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent) and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other approved State and Local procedures.

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID

If swallowed	<ul style="list-style-type: none"> Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If in eye	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> Take all contaminated clothing off. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-424-9293 or the National Pesticide Information Center at 1-800-858-7378.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if swallowed or inhaled. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Avoid contamination of food or feedstuffs.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface waters are present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions For Use and additional precautions and use restrictions.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not apply this product around electrical equipment due to possibility of shock hazard.

Ritter's **Flea & Tick Spray**

FOR CATS – KITTENS – DOGS –
PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs,
Cats over 12 Weeks Old and Horses
For temporarily repelling Gnats, Mosquitoes and Biting Flies

Active Ingredients:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.50%
**[N-octyl bicycloheptene dicarboximide]	0.50%
***[O-n-propyl isocinchomeronate]	0.50%
****Other ingredients	67.35%
Total:	100.00%

- * Equivalent to 1.2% [butylparthyl] (6-propylpiperonyl) ether and 0.3% related compounds.
- ** MGK® 264 Insecticide Synergist
- *** MGK® Repellent 326
- **** Inert ingredients include a grooming agent to ease combing and brushing our coat to remove dead fleas, ticks and lice.

WARNING

Keep out of reach of children

See side panels for additional Precautionary Statements

Manufactured For:
RITTER CHEMICAL LLC
P.O. Box 430874
Houston, TX 77243

EPA Reg. No.: 9468-31
EPA Est. No.: 47259-TX-01

NET CONTENTS:
32 FL. Oz. (946 mL)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its label.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES.

Read and follow all directions and precautions on this product label.

GENERAL PRECAUTIONS AND USE RESTRICTIONS

- Apply this product only as specified on this label.
- DO NOT** apply this product around electrical equipment due to the possibility of shock hazard.
- Easeggt when applying directly to pets, **DO NOT** allow adults, children or pets to enter treated area until sprays have dried.
- Remove pets, birds and cover fish aquariums before spraying.
- DO NOT** apply to pets less than 12 weeks old.
- Avoid spraying at genital areas.
- DO NOT** use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using **ANY** pesticides for pets. It signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Dogs and Cats: Cover animal's eyes with hand and with a firm towel stroke, to get dropper spray mist. Spray head, ears and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, midline and hind quarters, finishing with legs feet and paying special attention to the footpads (between toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long-haired dogs, rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Always spray thoroughly with ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week.

Puppies and Kittens: Do Not Use a Doggie or Kittens Under 12 Weeks Old. Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects.

Pet Grooming Quarters: For use in companion animal quarters only. Do not broadcast outdoors. Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once a week. The bedding should be sprayed and then replaced with fresh bedding for pet comfort. Allow all surfaces treated to dry before allowing pets to reoccupy.

Horses: To control stable flies, horse flies, deer flies and other face flies, apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once a week.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.
Pesticide Storage: Store this product only in original container, in a cool, dry area that is inaccessible to pets and children.
Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP or dispose in accordance with label. Never place unused product down any indoor or outdoor drain.

4.5" x 8.875" Rectangle
Prints Black with PMS 726 Light Brown tint background

REVISED 10-17-08

DATA PACKAGE BEAN SHEET

Date: 26-Mar-2009

Page 1 of 2

Decision #: 356496

DP #: (363508)

PRIA

Parent DP #:

Submission #:

*** Registration Information ***

Registration: 49784-4 - RITTER'S FLEA & TICK SPRAY

formerly 9468-31

Company: 49784 - RESEARCH LABORATORIES, INC.

Risk Manager: RM 10 - Richard Gebken - (703) 305-6701 Room# PY1 S-7237

Risk Manager Reviewer: Barbara Briscoe BBRISCOE

Sent Date: _____

Calculated Due Date: _____

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: _____

Ingredients: See page 2

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 26-Mar-2009

Due Back: _____

DP Ingredient: See page 2

DP Title: RD label review reregistration MGK 326

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / IB

Last Possible Science Due Date: _____

Team Name: RM 10

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

ATTN: RM 10 Richard Gebken

THIS PRODUCT IS RECOMMENDED FOR REREGISTRATION PENDING YOUR REVIEW FOR COMPLIANCE WITH THE MGK 326 RED, TECHNICAL REVIEWS, AND LABEL POLICIES.

DP#: (363508)

*** Product and Data Package Ingredients ***

Decision#: (356496)

PC Code	CAS	Ingredient Name
047201	136-45-8	2,5-Pyridinedicarboxylic acid, dipropyl ester
057001	113-48-4	MGK 264
067501	51-03-6	Piperonyl butoxide
069001	8003-34-7	Pyrethrins
047201	136-45-8	2,5-Pyridinedicarboxylic acid, dipropyl ester(.5%)
057001	113-48-4	MGK 264(.5%)
067501	51-03-6	Piperonyl butoxide(1.5%)
069001	8003-34-7	Pyrethrins(.15%)

Date: March 20, 2009

Reg. No.: 049784-0004 (Formerly 9468-31)

Product Name: Ritter's Flea & Tick Spray

PM Name/Number: Richard Gebken, Risk Management Team 10

Primary Reviewer: Judy Loranger

Secondary Reviewer: Larry Schnaubelt

Judy Loranger 3/24/09
L. Schnaubelt 3/24/09

New label or date of RD amended label: Amended, Stamped accepted on 1/17/08

Formulation Type: Liquid

Active Ingredient Assessed: MGK 326/PC Code 047201

Other ai's in product

Name/PC code:

MGK 264

Piperonyl butoxide

Pyrethrins

Reregistration Status or Registration Date:

DCI's not issued.

DCI's not issued.

DCI's not issued.

Note to PM:

1) PRB acknowledges the label comments in the RD letter dated 1/17/08. PRB has listed revisions below that are needed as a result of the acute toxicity review.

2) PRB recommends that the following text specified in the MGK 326 RED be added to the label but defers to RD regarding the need for this text:

"Do not apply over cuts, wounds, or irritated skin.

Do not apply near eyes and mouth. Apply sparing around ears."

3) The label must be revised to reflect the change in company.

Assessment can be found N:\prb\label\049784\004

1) Per the acute toxicity review, the signal word currently on the label "WARNING" must be revised to read "CAUTION."

2) As noted in the RD letter the "IF ON SKIN OR CLOTHING" statements appearing in the First Aid section must be revised to read:

"IF ON SKIN OR CLOTHING:

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.”

Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label in the following order:

“IF SWALLOWED:...
IF ON SKIN OR CLOTHING:...
IF IN EYES:...
IF INHALED:...”

3) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

“CAUTION

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, shoes, socks, and chemical-resistant gloves made of any waterproof material.”

Transfer History Information For
Product Registration - Section 3
49784-4, RITTER'S FLEA & TICK SPRAY

Registration #	Company #	Company Name	Transfer Date
9468-31	9468	RITTER CHEMICAL, LLC	04-Feb-2009
Total Rows: 1			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 14, 2008

MEMORANDUM:

Subject: EPA Reg. No.: 9468-31/Ritter's Flea & Tick Spray
DP Barcode: 349844
Case No.: 0002

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Marianne Lewis 5/14/08

To: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Ritter Chemical LLC
P.O. Box 430974
Houston, TX 77243

FORMULATION FROM EPA Reg. No. 9468-31 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
MGK 326	0.50%
MGK 264	0.50%
PBO	1.50%
Pyrethrin	0.15%
<u>Inert Ingredient(s):</u>	<u>97.35%</u>
Total	100.00%

BACKGROUND: In the 8 month response to the MGK 326 RED, the registrant is now requesting waivers for the acute toxicity studies to support the reregistration of their product, EPA Reg. No. 9468-3I. Based on the information contained in their waiver request (MRID # 473472-02) and information contained in the open literature, the Agency will grant the waiver requests. The subject product will be assigned the following Toxicity Categories: acute oral (81-1) – III, acute dermal (81-2) – III, acute inhalation (81-3), primary eye irritation (81-4) – III, primary skin irritation (81-5) – IV, negative for skin sensitization. If the registrant disagrees with any of these toxicity categories then new studies conducted with the subject product must be submitted for review.

RECOMMENDATIONS:

- The request to waive the acute toxicity studies for the subject product is granted. The subject product is assigned the Toxicity Categories listed below.

The acute toxicity profile for EPA Reg. No. 9468-3I is currently:

Acute Oral	III	Waived
Acute Dermal	III	Waived
Acute Inhalation	IV	Waived
Primary Eye	III	Waived
Primary Dermal	IV	Waived
Skin Sensitization	non sensitizer	Waived

NOTE: The acute toxicity study requirements have been satisfied for the subject product.

LABELING:

ID #: 009468-00031 **RITTER'S FLEA & TICK SPRAY**

SIGNAL WORD: **CAUTION**

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 17, 2008

Ms. Heather R. Bjornson,
Regulatory Agent for Ritter Chemical Company
c/o Technology Sciences Group, Inc.
1150 18th Street, NW, Suite 1000
Washington, DC 20036-3840

**Subject: Updates of First Aid, Storage and Disposal & Other Precautionary Statements
Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31
Your Submission Dated November 13, 2007**

Dear Ms. Bjornson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

Marketing Claims section comment(s):

1. Revise the 1st marketing claim to read: "FOR CATS – KITTENS – DOGS – PUPPIES – DOG HOUSES."
2. On the 2nd marketing claim, Insert the words "Over 12 Weeks Old" immediately following the word "Cats."

Ingredient Statement section comment(s):

3. Replace this section with:

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.50%
** (N-octyl bicycloheptene dicarboximide)	0.50%
*** (DI-n-propyl isocinchomerate)	0.50%
**** OTHER INGREDIENTS	97.35%
Total	100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ether and 0.30% related compounds.

**MGK® 264 Insecticide Synergist

***MGK® Repellent 326

****Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

First Aid section comment(s):

4. Replace the 4th and 5th rows of the existing First Aid section (table) with:

If on Skin or Clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378. ¹	

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

5. Delete all text in this section immediately following the signal word "**WARNING**" that has been marked with "~~strikethrough~~" and replace with: "Harmful if swallowed or inhaled. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of food or feedstuffs."

Precautionary Statements, Environmental Hazards subsection comment(s):

6. Replace the section with: "This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use for additional precautions and use restrictions."

Precautionary Statements, Physical or Chemical Hazards subsection comment(s):

7. Replace this section with: "Flammable. Keep away from heat and open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard."

Directions for Use section comment(s):

8. Delete all text in the introduction to the Directions for Use section immediately following the statement "It is a violation of ..." that has been marked with "~~strikethrough~~" and replace with:

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ONLY ON DOGS, PUPPIES, CATS AND KITENS (OVER 12 WEEKS OLD) AND HORSES.²

Read and follow all directions and precautions on this product label.³

General Precautions and Use Restrictions	
<ul style="list-style-type: none"> • Apply this product only as specified on this label. • DO NOT apply this product around electrical equipment due to the possibility of shock hazard. • Except when applying directly to pets, DO NOT allow adults, children or pets to enter treated area until sprays have dried. • Remove pets, birds and cover fish aquariums before spraying. • DO NOT apply to pets less than 12 weeks old. • Avoid spraying of genital areas. • DO NOT use on horses or foals intended for slaughter. • Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. • Sensitivities may occur after using ANY pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. 	

¹ Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

² For more detailed information on labeling claims permitted by the Agency, please refer to PR Notice 96-6.

³ This new General Precautions and Use Restrictions section is required by the Reregistration Eligibility Decision documents (REDs) for pyrethrins, piperonyl butoxide and MGK® 264 and replaces existing text deleted from various areas of the label.

Directions for Use, Cats and Dogs subsection comment(s):

9. Replace this subsection with: **"Dogs and Cats:** Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears and chest until damp. With finger tips, rub into face and around mouth, nose and eyes. Then spray neck, middle and hindquarters, finishing with legs last and paying special attention to the footpads (between the toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long-haired dogs, rub your hand against the lay of the hair, spraying the ruffed hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week."

Directions for Use, Puppies and Kittens subsection comment(s):

10. Replace this subsection with: **"Puppies and Kittens: Do not use on puppies or kittens under 12 weeks old.** Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects."

Directions for Use, Pet Sleeping Quarters subsection comment(s):

11. Replace this subsection with: **"Pet Sleeping Quarters:** For use in companion animal quarters only. Do not broadcast outdoors. Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy."

Directions for Use, Horses subsection comment(s):

12. Replace this subsection with: **"Horses:** To control stable flies, horse flies, deer flies and other face flies, apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week."

Storage and Disposal section comment(s):

13. Replace the existing section with the following:

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product only in original container in a cool, dry area that is inaccessible to pets and children.

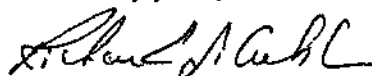
Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling, if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Ritter Chemical Company should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK® 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and MGK® 264.

4 8 8

Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. A stamped copy of the label for this product is enclosed for your records. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosure

009468-00031 D386553

Text Label without graphics, pictures and illustrations

Ritter's

Flea & Tick Spray

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....	0.15%
*Piperonyl butoxide, technical.....	1.50%
(N-octyl bicycloheptene dicarboximide).....	0.50%
(Di-n-propyl isocinchomeronate).....	0.50%
**Other Ingredients:	97.35%
Total:.....	100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

WARNING

Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

ACCEPTED
with COMMENTS
In EPA Letter Dated
January 17, 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
9468-31

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<p>If you suspect a reaction to this product:</p> <ul style="list-style-type: none"> • Discontinue use. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31. You may also contact CHEMTREC at 1-800-424-9300 for emergency treatment information.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

~~WARNING: NOT TO BE USED ON ANIMALS TO BE USED AS A SOURCE OF FOOD OR FEED~~

~~HUMANS: Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contamination of feed or foodstuffs. Wash hands with soap and water after using.~~

~~ANIMALS: Avoid contact with animal's eyes. Do not use on nursing animals. If treatment is necessary, spray on fingertips and rub into coat.~~

~~Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals.~~

~~Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.~~

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- ~~Do not use this product in or around electrical equipment due to possibility of shock hazard.~~
- ~~USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.~~
- ~~Do not use on horses or foals intended for slaughter.~~
- ~~Do not apply over cuts, wounds, or irritated skin.~~
- ~~Do not apply near eyes and mouth. Apply sparingly around ears.~~

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors. Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Text Label without graphics, pictures and illustrations

Ritter's
Flea & Tick Spray

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl butoxide, technical.....1.50%
(N-octyl bicycloheptene dicarboximide).....0.50%
(Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

WARNING
Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product in or around electrical equipment due to possibility of shock hazard.

USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.

Do not use on horses or foals intended for slaughter.

Do not apply over cuts, wounds, or irritated skin.

Do not apply near eyes and mouth. Apply sparingly around ears.

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors.

Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

DATE OUT: 29/AUG/06

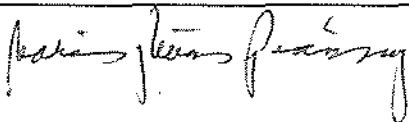
SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE No.: 330815 Reg./File Symbol No. 9468-31

Product Name: Ritter's Flea and Tick Spray MRID No: 468734-01

Company Name: Ritter Chemical LLC Action Code: 674

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508C)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 2215, was issued in September 23, 2003 for the Technical Grade Active Ingredient (TGAI), MGK 326: Di-n-propyl isocinchomeronate (2,5-Pyridine carboxylic acid, dipropyl ester). The generic data base supporting the reregistration of MGK 326 for its current uses have been reviewed and found to be substantially complete.

The registrant submitted a basic formulation Confidential Statement of Formula (CSF), dated 6/27/06, a draft label EPA received 6/29/06, and product chemistry data in MRID number 468734-01. The registrant is requesting FIFRA Section 4 reregistration of **Ritter's Flea and Tick Spray**, EPA Reg. No. **9468-31**.

FINDINGS:

1. The CSF for the basic formulation dated 6/27/06 is acceptable as presented. The nominal concentrations of the active ingredients agree with those on the label, meeting PR Notice 91-2. The certified limits on the active and inert ingredients are acceptable in accordance with 40 CFR 158.175(b)(2). All ingredients listed on the CSF are cleared for use in pesticide formulations.
2. Except for Findings 3, 4 and 5, the data submitted in MRID number 468734-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity, Composition and Analysis, and Physical and Chemical Properties, respectively.
3. The registrant is proposing a waiver of the Storage Stability requirement (MRID number 468734-01) as they expect the product to be stable when stored in the original container for at least one year. The basis for the proposed waiver is not acceptable. The actual study must be conducted, in full compliance with the GLP standards, and the results (showing change or no change in active ingredient concentrations over time) must be submitted for review. Guideline 830.6317 is outstanding.
4. There are no data available to support the claim that the product is not corrosive to several types of containers (MRID number 468734-01). The Corrosion Characteristics testing must be conducted for a period of one year (preferably along with the Storage Stability study) in the product's commercial container at room temperature. Guideline 830.6320 is outstanding.

THIS REVIEW CONTAINS FIFRA CBI

5. Guideline 830.1800, Enforcement Analytical Method, is not fulfilled because the registrant has not submitted or referenced methods for analysis of MGK 264 and MGK 326. Therefore, GRN 830.1800 is identified as a data gap.
- 6a. The Ingredients statements on the label are acceptable in accordance with 40 CFR §158.155.
- 6b. The Physical or Chemical Hazards statements are acceptable as per 40 CFR §156.10(h)(2)(iii).
- 6c. The Storage and Disposal statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

Except for Findings 3, 4 and 5, the registrant has satisfied product chemistry data requirements for the reregistration of EPA Reg. No. 9468-31.

REVIEW OF PRODUCT CHEMISTRY DATA:**PRODUCT NAME:** Ritter's Flea and Tick Spray**EPA Reg. No:** 9468-31**Group A: Series 830-Product Identity, Composition, and Analysis (40 CFR158.155, .160, .165, .167, .170, .175 & .180).**830-1550 Product Identity and Composition

EPA Reg. No. 9468-31 is an end-use product produced through a non-integrated system. The active ingredients Pyrethrins, Piperonyl Butoxide (PBO), N-Octyl bicycloheptene dicarboximide (MGK 264), and MGK 326 (Di-n-propyl isocinchomeronate), are each claimed in the label at 0.15%, 1.50%, 0.50%, and 0.50%, respectively. The inert ingredients are present at 97.35%.

830-1600 Description of Materials Used to Produce the Product

Refer to Confidential Appendix A.

830-1620 Discussion of Formulation Process

Refer to Confidential Appendix A.

830-1670 Discussion of Formation of Impurities

Refer to Confidential Appendix A.

830-1700 Preliminary Analysis

Refer to Confidential Appendix A.

830-1750 Certified Limits

Refer to Confidential Appendix A.

830-1800 Enforcement of Analytical Method

The Pyrethrins method of analysis is outlined as follows: a) The pyrethrins are extracted with light petroleum and hydrolysed with alkali to chrysanthemum mono- and di-carboxylic acids. b) The acids are converted to their water-soluble barium salts, the aqueous solution is filtered, and the acids are regenerated with sulfuric acid. c) The monocarboxylic acid from "Pyrethrin I" is extracted from the aqueous solution with light petroleum and reacted with mercuric sulfate and the mercurous sulfate formed is titrated with standard potassium iodate. d) The dicarboxylic acid, from "Pyrethrin II" is extracted with ether from the aqueous solution remaining after the extraction of the monocarboxylic acid, and is titrated with standard sodium hydroxide. Sample calculations for Pyrethrins content were included.

No method for analysis of MGK 264 and MGK 326 were submitted or cited.

THIS REVIEW CONTAINS FIFRA CBI

Product Chemistry Data**Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)**

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	MRID/Accession Number	Data Fulfilled
.1550 Product Identity and Composition	468734-01 and CSF	Y
.1600 Description of Materials Used to Produce the Product	468734-01	Y
.1620 Description of Formulation Process	468734-01.	Y
.1650 Discussion of Formation of Impurities	468734-01	Y
.1700 Preliminary Analysis	N/A	N/A
.1750 Certified Limits	468734-01 and CSF	Y
.1800 Enforcement Analytical Method		G

Subgroup B: Series 830.6302 -7950 (40 CFR 158.190)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	VALUE OR QUALITATIVE DESCRIPTION	MRID Number	Data Fulfilled
.6302 Color	Light to clear yellow.	468734-01	Y
.6303 Physical State	Liquid at RT	468734-01	Y
.6304 Odor	Light floral odor	468734-01	Y
.6314 Oxidation/Reduction: Chemical Incompatibility	Not applicable - contains no oxidizing or reducing agents.	468734-01	N/A
.6315 Flammability/Flame Extension	55°F	468734-01	Y
.6316 Explodability	Not applicable. Product does not contain components that are potentially explosive.	468734-01	N/A
.6317 Storage Stability	See Finding 3.		G (waiver denied)
.6319 Miscibility	N/A. (not to be diluted with petroleum solvents.		N/A
.6320 Corrosion Characteristics	See Finding 4.		G

.6321 Dielectric Breakdown Voltage	Not applicable; product is not labeled to be used around electrical equipments.		N/A
.7000 pH	Not applicable; product is not dispersible in water.	468734-01	Y
.7100 Viscosity	2.43 cP @ 20°C	468734-01	Y
.7300 Density/Relative Density/Bulk Density	Sp. Gravity: 6.5 lbs/gal @ 20°C	468734-01	Y

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived

THIS REVIEW CONTAINS FIFRA CBI

Confidential Appendix A830-1600 Description of Materials Used to Produce the Product

Description of materials used in formulation is found in MRID number 468734-01 and in the CSF.

830-1650 Description of Formulation Process830-1670 Discussion of Formation of Impurities830-1700 Preliminary Analysis

Not required.

830-1750 Certified Limits

Pyrethrins: Lower Limit: 0.14%; Nominal Conc.: 0.15%; Upper Limit: 0.17%

PBO: Lower Limit: 1.43%; Nominal Conc.: 1.5%; Upper Limit: 1.58%

MGK 264: Lower Limit: 0.45%; Nominal Conc.: 0.50%; Upper Limit: 0.55%

MGK 326: Lower Limit: 0.45%; Nominal Conc.: 0.50%; Upper Limit: 0.55%

M.R. Piansay and Central File (EPA Reg. No. 9468-31
7508C:SRRD:PRB:CM-2; M.R.P.: (29/AUG/06):703-308-8063;<9468-31>

THIS REVIEW CONTAINS FIFRA CBI

Manufacturing process information may be entitled to confidential treatment

DATE OUT: 19/MAY/08

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 352709 REG./FILE SYMBOL NO.: 9468-31

PRODUCT NAME: Ritter's Flea and Tick Spray MRID NO: 474214-01

COMPANY NAME: Ritter Chemical LLC ACTION CODE: 675

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508P)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

With this re-submission, the registrant has provided information on analytical methods used to determine the active ingredients in this product. Data on accelerated Storage Stability study were also submitted. Enforcement Analytical Method (GRN 830.1800), Storage Stability (GRN 830.6317), and Corrosion Characteristics (GRN 830.6320) were identified as outstanding data in our previous reviews dated 8/29/06, 10/16/07, and 11/15/07. The registrant is requesting FIFRA Section 4 reregistration of **Ritter's Flea and Tick Spray**, EPA Reg. No. **9468-31**.

FINDINGS:

1. The analytical methods used by the registrant to quantify the active ingredients are as follows:

[REDACTED]

Claimed confidential by submitter

2. A 28-day accelerated Storage Stability study (conducted in compliance with GLPS) was conducted in combination with Corrosion Characteristics study. One container of the subject product was tested for active ingredients content at an initial (zero time) assay and at the end of the 14-day and 28-day periods at a temperature of 50°C. All of the HPLC methods described above were used to determine the percentage of each active ingredient at each time point. In addition, the product material and sample container were visually examined for physical changes from the initial sample. Results are summarized below:

Active Ingredient	Label Claim	Zero-time Assay (ave.)	14-day Assay (ave.)	28-day Assay (ave.)
Pyrethrin	0.15%	0.164%	0.164%	0.162%
PBO	1.50%	1.57%	1.53%	1.49%
MGK-264	0.50%	0.508%	0.505%	0.513%
MGK-326	0.50%	0.508%	0.510%	0.505%

No degradation of active ingredients occurred at either 14-day or 28-day testing. Further, no changes were observed in either the sample or the container.

3. The one-year, room temperature, Storage Stability (with Corrosion Characteristics) is currently ongoing according to the registrant. The requirements pertaining to GRN 830.6317 and 830.6320, respectively, are still outstanding.

CONCLUSIONS:

The registrant has satisfied the requirement for Enforcement Analytical Method (GRN 830.1800) but still needs the one-year, room-temperature Storage Stability and Corrosion Characteristics data, in order to satisfy the MGK-326 product chemistry data requirements for the reregistration of the subject product.

DATE OUT: May 28, 2008

SUBJECT: RE-REVISED PRODUCT CHEMISTRY REVIEW OF:

Technical Product [],
Manufacturing Use Product [],
End Use Product [X]

BARCODE No.: D349846 EPA RECEIVED DATE: 02/14/08

EPA Reg. No.: 9468-31

PRODUCT NAME: Ritter's Flea & Tick Spray

MRIDs: 473365-01, 473472-01

COMPANY NAME: Ritter Chemical L.L.C.

Action Code: 674

FROM: Bentley C. Gregg, Product Chemist
Product Chemistry Team
PRB/SRRD (7508P)

Bentley C. Gregg 5/28/08

TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508P)

INTRODUCTION:

In response to earlier Product Chemistry reviews (29/AUG/06; 16/OCT/07; 15/NOV/07; all by Maria Rivera Piansay), the registrant, Ritter Chemical LLC, has now submitted an Analytical Methods document (MRID 473365-01) and a new, but only partial study for Storage Stability and Corrosion Characteristics (MRID 473472-01), and is requesting FIFRA Section 4 reregistration of their end-use product, Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31.

FINDINGS:

1. In the earlier Product Chemistry reviews (29/AUG/06; 16/OCT/07; 15/NOV/07; all by Maria Rivera Piansay), it had been determined that the registrant had satisfied all the guideline requirements for Product Chemistry data, except for an Enforcement Analytical Method for all the active ingredients, and for the data for Storage Stability and Corrosion Characteristics. The registrant has now submitted a document (MRID 473365-01) describing methods for all four active ingredients, and a report providing partial data for the Storage Stability and Corrosion Characteristics (MRID 473472-01).
2. MRID (473365-01; 2008) lists individual analytical methods from Custom Industrial Analysis Labs of St. Joseph, Missouri, for each of the four active ingredients;

[REDACTED]

Claimed confidential by submitter



, for purposes of Product Reregistration, these four analytical method will be deemed to be acceptable.

3. The registrant has also submitted a report providing partial data for the Storage Stability and Corrosion Characteristics (MRID 473472-01), with a full 1-year study being described as underway, as well as a full Accelerated 28-day study (at 50 °C) also underway. In the MRID, the samples are described as having been analyzed after 14 days of storage, and included in this partial data report "as data was required for submission in an expedited manner." The registrant delivered ten (10) 32 fl oz bottles of sample (Ritter's Flea and Tick Spray) to their testing laboratory, Custom Industrial Analysis Labs. One sample bottle was analyzed immediately, and others were stored as directed, with the one sample bottle removed from the 50 °C test chamber after 14 days, and analyzed, with the results reported as follows:

Average of Replicate Analyses of one Sample	Active	Label Claim	Zero-Time Assay: %	14 days at 50 °C: %
	Pyrethrins	0.15%	0.164	0.164
	PBO	1.50%	1.57	1.53
	MGK-264	0.50%	0.508	0.505
	MGK-326	0.50%	0.508	0.510

The MRID reported that PBO was analyzed utilizing method CIA D-76, the Pyrethrins utilizing Method CIA D-77, MGK-326 utilizing Method CIA D-94.1, and MGK-264 utilizing CIA D-279 (a different method than in the Enforcement Analytical Method MRID [473365-01], which was CIA D-225.2, but the identical CIA methods were utilized for the other three active ingredients). The MRID reported that "Examination of the chromatography showed no degradation products (no additional or unusual peaks) in any of the assays at the 14 day accelerated time point." It was also reported, "In addition, the sample material and product container were examined for adverse changes in physical condition from the initial time. No changes were observed in either the product or container." These data show no evidence of any product degradation nor any corrosion problems; however, this is **only a partial data set** and only from an **accelerated storage stability** study; therefore, the **registrant is again requested to submit a full 1-year Storage Stability and Corrosion Characteristics study**.

CONCLUSIONS:

Once the registrant has submitted the full 1-year Storage Stability and Corrosion Characteristics data (Finding 3 herein), then the registrant will have satisfied the product chemistry requirements for reregistration of their end-use product, **Ritter's Flea & Tick Spray, Reg. No. 9468-31**.

Reviewer and Central File (Reg. No. 9468-31).

7508P:SRRD:PRB:PY1:B.C.G.:05/28/08:703-308-8178;<9468-31>

DATE OUT: 23/MAR/09

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

BARCODE NO.: 363203

REG./FILE SYMBOL NO.: 9468-31

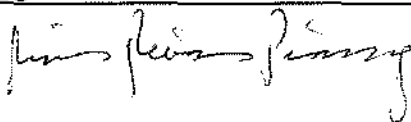
PRODUCT NAME: Ritter's Flea and Tick Spray

MRID NO: 476933-01

COMPANY NAME: Ritter Chemical LLC

ACTION CODE: 675

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
PRB/SRRD (7508P)



TO: Barbara Briscoe, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

INTRODUCTION:

With this re-submission, the registrant has provided additional product chemistry data pertaining to the Storage Stability (GRN 830.6317) and Corrosion Characteristics (GRN 830.6320), in support of the reregistration of **Ritter's Flea and Tick Spray**, EPA Reg. No. **9468-31**.

FINDINGS:

1. The one-year, room-temperature Storage Stability study was conducted in compliance with the Good Laboratory Practice Standards (GLPS). One container of the subject product was tested for active ingredients content at an initial (zero time) assay and after 3, 6, 9, and 12 months at 25 ± 2°C. All of the HPLC methods described above were used to determine the percentage of each active ingredient at each time point. In addition, the product material and sample container were visually examined for physical changes from the initial sample. Results are summarized below:

Active Ingredient	Label Claim	% Active Ingredient (ave.)				
		Initial	3-month	6-month	9-month	12-month
Pyrethrin	0.15%	0.164	0.171	0.170	0.173	0.172
PBO	1.50%	1.570	1.520	1.421	1.530	1.500
MGK-264	0.50%	0.508	0.465	0.480	0.488	0.517
MGK-326	0.50%	0.508	0.483	0.500	0.505	0.508

No degradation of active ingredients occurred (no additional or unusual peaks) in any of the assays at the 3, 6, 9, or 12 month periods. Further, no changes were observed in either the sample or the container throughout the study.

2. The active ingredient statement on the label is acceptable in accordance with PR Notice 91-2 and 40 CFR 158.155. There are no data present that trigger the heading "Physical or Chemical Hazards" on the label. The Storage and Disposal statements are acceptable in accordance with 40 CFR 156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The submitted Storage Stability and Corrosion Characteristics data satisfy GRNs 830.6317 and 830.6320, respectively. The registrant has now satisfied the MGK-326 product chemistry data requirements for the reregistration of the subject product.

Text Label without graphics, pictures and illustrations

**Ritter's
Flea & Tick Spray**

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl butoxide, technical.....1.50%
(N-octyl bicycloheptene dicarboximide).....0.50%
(Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

WARNING
Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use this product in or around electrical equipment due to possibility of shock hazard.

USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.

Do not use on horses or foals intended for slaughter.

Do not apply over cuts, wounds, or irritated skin.

Do not apply near eyes and mouth. Apply sparingly around ears.

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors.

Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Material to be added to an e-Jacket/Jacket

Reg. No. 49784-4

Description: Amended Label and CSF under reregistration for Ritter's Flea and Tick Spray

1. ☐ Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

☒ Newly stamped accepted label

☐ Notification

☒ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Clayton Myers

Phone: 347-8874 Division: RD-IB

Date: May 26, 2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 26, 2009

Heather R. Bjornson
Regulatory Agent for Research Laboratories, Inc.
Technology Sciences Group, Inc.
1150 18th Street, N.W.
Washington, DC 20036

Subject: Amended Re-registration Label
Product Name: Ritter's Flea and Tick Spray
OPP Decision: 356496
EPA Reg. No.: 49784-4

Dear Ms. Bjornson;

The Agency in accordance with the Federal Fungicide and Rodenticide Act as Amended (FIFRA) has completed reviewing all of the information submitted with your application to support the reregistration of the aforementioned product in connection with the MGK[®] 326 RED, and have concluded that your submission is acceptable.

The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines are complete. When the guidelines are finalized, the Agency expects to issue a Data Call-In to address the revised guidelines to all registrants with registrations for products that have not previously submitted efficacy data sufficiently consistent with the revised guidelines.

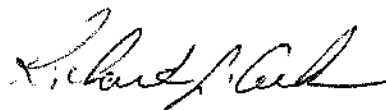
NOTE: This product is not being re-registered under FIFRA Sec. 4(g) at this time.

Research Laboratories, Inc. should note that a notice of availability of EPA's reregistration eligibility decision (RED) document for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). EPA's RED for products containing MGK[®] 264 was published in the *Federal Register* on July 26, 2006 (Volume 71,

Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing piperonyl butoxide, pyrethrins, and/or MGK[®] 264.

A copy of your label stamped "Accepted" is enclosed for your records.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Gebken". The signature is fluid and cursive, with the first name being the most prominent.

Richard J. Gebken, Product Manager (10)
Registration Division, Insecticide Branch

Attachment

Text Label without graphics, pictures and illustrations

Ritter's Flea & Tick Spray

FOR CATS – KITTENS – DOGS - PUPPIES - DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats Over 12 Weeks Old, and
Horses

For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....	0.15%
*Piperonyl Butoxide, Technical.....	1.50%
** (N-octyl bicycloheptene dicarboximide).....	0.50%
*** (Di-n-propyl isocinchomeronate).....	0.50%
**** Other Ingredients:	<u>97.35%</u>
Total:	100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ester and 0.30% related compounds

**MGK® 264 Insecticide Synergist

***MGK® Repellant 326

**** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

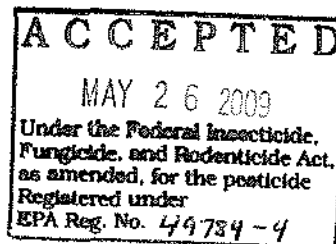
CAUTION Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 49784-4
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Research Laboratories, Inc.
PO Box 801854
Houston, TX 77280-1854



READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-424-9300 or the National Pesticide Information Center at 1-800-858-7378.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

CAUTION: Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made of waterproof material. Users should wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use and additional precautions and use restrictions.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES.

Read and follow all directions and precautions on this product label.

General Precautions and Use Restrictions

- Apply this product only as specified on this label.
- **DO NOT** apply this product around electrical equipment due to the possibility of shock hazard.
- Except when applying directly to pets, **DO NOT** allow adults, children or pets to enter treated area until sprays have dried.
- Remove pets, birds and cover fish aquariums before spraying.
- **DO NOT** apply to pets less than 12 weeks old.
- Avoid spraying of genital areas.
- **DO NOT** apply over cuts, wounds, or irritated skin.
- **DO NOT** apply near eyes and mouth. Apply sparingly around ears.
- **DO NOT** use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using **ANY** pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Dogs and Cats: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing with legs last and paying special attention to the footpads (between toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week.

Puppies and Kittens: Do not use On puppies or kittens under 12 weeks old.

Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects.

Pet's Indoor Sleeping Quarters:

Do not contaminate water, food or feed by use of this product.

For use in companion animal quarters only. Do not broadcast outdoors.

Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store in original container, in a cool, dry place, inaccessible to children and pets. If a leaky container must be contained within another, mark the outer container to identify the contents. Do not store near heat or open flame. Store pesticides away from food, pet food, seed, fertilizers and veterinary supplies.

Pesticide Disposal: Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20038

Telephone 202 223-4392

Fax 202 872-0745

Clayton Myers
Richard Gebken
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

May 12, 2009

RE: Ritter's Flea and Tick Spray (EPA Reg. No. 49784-4)

Response to EPA letter dated April 21, 2009

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Messrs Myers and Gebken:

Technology Sciences Group inc., on behalf of Research Laboratories, Inc., is submitting the enclosed response to the above referenced letter. You will find the following included per the EPA letter:

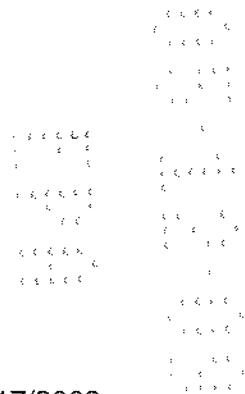
- 1) EPA application form,
- 2) Revised Confidential Statement of Formula (CSF) dated May 12, 2009,
- 3) Revised Formulator's exemption form,
- 4) One redline version of the revised label, and
- 5) Three copies of the clean version of the revised label.

Please note: EPA approved a label amendment for this product on January 17, 2008 (attached), so the changes were made to this version of the label.

Should you have any questions or comments please contact me at (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Agent for Research Laboratories, Inc.



Attachment: EPA letter approving label amendment dated 1/17/2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 17, 2008

Ms. Heather R. Bjornson,
Regulatory Agent for Ritter Chemical Company
c/o Technology Sciences Group, Inc.
1150 18th Street, NW, Suite 1000
Washington, DC 20036-3840

**Subject: Updates of First Aid, Storage and Disposal & Other Precautionary Statements
Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31
Your Submission Dated November 13, 2007**

Dear Ms. Bjornson:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following provision(s):

Marketing Claims section comment(s):

1. Revise the 1st marketing claim to read: "FOR CATS – KITTENS – DOGS – PUPPIES – DOG HOUSES."
2. On the 2nd marketing claim, insert the words "Over 12 Weeks Old" immediately following the word "Cats."

Ingredient Statement section comment(s):

3. Replace this section with:

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
*Piperonyl Butoxide, Technical	1.50%
** (N-octyl bicycloheptene dicarboximide)	0.50%
*** (DI-n-propyl isocinchomeronate)	0.50%
**** OTHER INGREDIENTS	97.35%
Total	100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ether and 0.30% related compounds.

**MGK® 264 Insecticide Synergist

***MGK® Repellent 326

****Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

First Aid section comment(s):

4. Replace the 4th and 5th rows of the existing First Aid section (table) with:

If on Skin or Clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-xxx-xxxx or the National Pesticide Information Center at 1-800-858-7378. ¹	

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

5. Delete all text in this section immediately following the signal word "**WARNING**" that has been marked with "~~strikethrough~~" and replace with: "Harmful if swallowed or inhaled. Avoid breathing spray mist. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of food or feedstuffs."

Precautionary Statements, Environmental Hazards subsection comment(s):

6. Replace the section with: "This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use for additional precautions and use restrictions."

Precautionary Statements, Physical or Chemical Hazards subsection comment(s):

7. Replace this section with: "Flammable. Keep away from heat and open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard."

Directions for Use section comment(s):

8. Delete all text in the introduction to the Directions for Use section immediately following the statement "It is a violation of ..." that has been marked with "~~strikethrough~~" and replace with:

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ONLY ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES. ²

Read and follow all directions and precautions on this product label. ³

General Precautions and Use Restrictions	
<ul style="list-style-type: none">• Apply this product only as specified on this label.• DO NOT apply this product around electrical equipment due to the possibility of shock hazard.• Except when applying directly to pets, DO NOT allow adults, children or pets to enter treated area until sprays have dried.• Remove pets, birds and cover fish aquariums before spraying.• DO NOT apply to pets less than 12 weeks old.• Avoid spraying of genital areas.• DO NOT use on horses or foals intended for slaughter.• Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.• Sensitivities may occur after using ANY pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.	

¹ Please note that the "1-800-xxx-xxxx" number listed must be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.

² For more detailed information on labeling claims permitted by the Agency, please refer to PR Notice 96-6.

³ This new General Precautions and Use Restrictions section is required by the Reregistration Eligibility Decision documents (REDs) for pyrethrins, piperonyl butoxide and MGK® 264 and replaces existing text deleted from various areas of the label.

Directions for Use, Cats and Dogs subsection comment(s):

9. Replace this subsection with: **"Dogs and Cats:** Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears and chest until damp. With finger tips, rub into face and around mouth, nose and eyes. Then spray neck, middle and hindquarters, finishing with legs last and paying special attention to the footpads (between the toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long-haired dogs, rub your hand against the lay of the hair, spraying the ruffed hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week."

Directions for Use, Puppies and Kittens subsection comment(s):

10. Replace this subsection with: **"Puppies and Kittens: Do not use on puppies or kittens under 12 weeks old.** Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects."

Directions for Use, Pet Sleeping Quarters subsection comment(s):

11. Replace this subsection with: **"Pet Sleeping Quarters:** For use in companion animal quarters only. Do not broadcast outdoors. Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy."

Directions for Use, Horses subsection comment(s):

12. Replace this subsection with: **"Horses:** To control stable flies, horse flies, deer flies and other face flies, apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week."

Storage and Disposal section comment(s):

13. Replace the existing section with the following:

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product only in original container in a cool, dry area that is inaccessible to pets and children.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling, if available. **If partly filled:** Call your solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Ritter Chemical Company should note that a notice of availability of EPA's RED for products containing pyrethrins was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42387-42389). In addition, EPA's RED for products containing piperonyl butoxide was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42385-42386). Further, EPA's RED for products containing MGK® 264 was published in the *Federal Register* on July 26, 2006 (Volume 71, Number 143, Pages 42381-42383). As a result, additional data and/or labeling changes may be required for products containing pyrethrins, piperonyl butoxide and MGK® 264.

Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. A stamped copy of the label for this product is enclosed for your records. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,



Richard J. Gebken,
Product Manager (10)
Insecticide Branch,
Registration Division (7505P)

Enclosure

009468-00031 D386553

Text Label without graphics, pictures and illustrations

**Ritter's
Flea & Tick Spray**

FOR CATS – KITTENS – PUPPIES – DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats, and Horses, and
For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl butoxide, technical.....1.50%
(N-octyl bicycloheptene dicarboximide).....0.50%
(Di-n-propyl isocinchomeronate).....0.50%
****Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.2% (butylcarbityl) (6-propylpiperonyl) ester and 0.3% related compounds

** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

**WARNING
Keep Out of Reach of Children**

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-31
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Ritter Chemical Company
P. O. Box 430974
Houston, TX 77243

**ACCEPTED
with COMMENTS
In EPA Letter Dated
January 17, 2008**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
9468-31

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<p>If you suspect a reaction to this product:</p> <ul style="list-style-type: none"> • Discontinue use. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Ritter's Flea & Tick Spray, EPA Reg. No. 9468-31. You may also contact CHEMTREC at 1-800-424-9300 for emergency treatment information.</p>	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

~~WARNING: NOT TO BE USED ON ANIMALS TO BE USED AS A SOURCE OF FOOD OR FEED~~

~~HUMANS: Harmful if swallowed or inhaled. Avoid breathing spray mist. Avoid contamination of food or foodstuffs. Wash hands with soap and water after using.~~

~~ANIMALS: Avoid contact with animal's eyes. Do not use on nursing animals. If treatment is necessary, spray on fingertips and rub into coat.~~

~~Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals.~~

~~Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.~~

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is or present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not use this product in or on electrical equipment due to possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- ~~Do not use this product in or around electrical equipment due to possibility of shock hazard.~~
- ~~USE ONLY IN A WELL VENTILATED AREA. Remove birds and cover aquariums before spraying. Remove safety cap and insert sprayer.~~
- ~~Do not use on horses or foals intended for slaughter.~~
- ~~Do not apply over cuts, wounds, or irritated skin.~~
- ~~Do not apply near eyes and mouth. Apply sparingly around ears.~~

Cats and Dogs: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing legs last. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Repeat treatment as needed.

Puppies and Kittens:

Do Not Use On Puppies or Kittens Under 12 Weeks.

Treat same as cats and dogs except nursing puppies and kittens, spray only along back or on your finger tips and rub in with your finger tips.

Pet Sleeping Quarters:

For use in companion animal quarters only, do not broadcast outdoors. Remove animals from quarters before treating premises.

Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Repeat as needed. The bedding should be sprayed and then replaced with fresh bedding for best results.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Repeat treatment as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product in the original container, in a cool place, away from children and pets.

Pesticide Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available

If **partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 49784-4	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ritter's Flea & Tick Spray	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Research Laboratories, Inc. PO Box 801854 Houston, TX 77280-1854 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>4/21/2009</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This submission is in response to the EPA Letter dated April 21, 2009 to complete the MGK 326 re-registration of this product.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 16 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson, Technology Sciences Group, Inc.	Title Regulatory Agent	Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Agent for Research Laboratories, Inc.		
4. Typed Name Heather R. Bjornson	5. Date May 12, 2009		



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Research Laboratories, Inc.
PO Box 801854
Houston, TX 77280-1854

EPA File Symbol/Registration Number

49784-4

Product Name

Ritler's Flea & Tick Spray

Date of Confidential Statement of Formula (EPA Form 8570-4)

May 12, 2009

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Pyrethrins, Di-n-propyl-isocinchomeronate, Piperonyl Buloxide, N-octyl-bicycloheptane dicarboximide

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ **(A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).**

OR

☐ **(B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.**

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Pyrethrins and Piperonyl Buloxide	[REDACTED]	[REDACTED]
Di-n-propyl-isocinchomeronate	MGK Repellent 326 II	1021-1860
N-octyl-bicycloheptane dicarboximide	[REDACTED]	[REDACTED]
Signature <i>Heather R. Bjornson</i>	Name and Title Heather Bjornson, Regulatory Consultant	Date May 12, 2009

Text Label without graphics, pictures and illustrations

Ritter's
Flea & Tick Spray

FOR CATS – KITTENS – DOGS - PUPPIES - DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats Over 12 Weeks Old, and
Horses

For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....0.15%
*Piperonyl Butoxide, Technical.....1.50%
**(N-octyl bicycloheptene dicarboximide).....0.50%
*** (Di-n-propyl isocinchomeronate).....0.50%
******Other Ingredients:**97.35%
Total:.....100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ester and 0.30% related compounds

**MGK® 264 Insecticide Synergist

***MGK® Repellant 326

**** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

WARNINGCAUTION
Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 9468-34 49784-4

EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:

Ritter Chemical Company Research Laboratories, Inc.

P. O. Box 430974 PO Box 801854

Houston, TX 77243 Houston, TX 77280-1854

Ritter's Flea & Tick Spray
EPA Reg. No. 49784-4
Label Version (4) dated May 12, 2009
Page 1 of 4

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-424-9300 or the National Pesticide Information Center at 1-800-858-7378.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

WARNING/CAUTION: Harmful if swallowed or inhaled. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made of waterproof material. Avoid breathing spray mist. ~~Users should wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of food or feedstuffs.~~

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use and additional precautions and use restrictions.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES.

Read and follow all directions and precautions on this product label.

General Precautions and Use Restrictions

- Apply this product only as specified on this label.
- **DO NOT** apply this product around electrical equipment due to the possibility of shock hazard.
- Except when applying directly to pets, **DO NOT** allow adults, children or pets to enter treated area until sprays have dried.
- Remove pets, birds and cover fish aquariums before spraying.
- **DO NOT** apply to pets less than 12 weeks old.
- Avoid spraying of genital areas.
- **DO NOT** apply over cuts, wounds, or irritated skin.
- **DO NOT** apply near eyes and mouth. Apply sparingly around ears.
- **DO NOT** use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using **ANY** pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Dogs and Cats: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing with legs last and paying special attention to the footpads (between toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week.

Puppies and Kittens: Do not use On puppies or kittens under 12 weeks old.

Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects.

Pet's Indoor Sleeping Quarters:

Do not contaminate water, food or feed by use of this product.

For use in companion animal quarters only. Do not broadcast outdoors.

Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store this product only in original container, in a cool, dry area place, that is inaccessible to pets and children and pets. If a leaky container must be contained within another, mark the outer container to identify the contents. Do not store near heat or open flame. Store pesticides away from food, pet food, seed, fertilizers and veterinary supplies.

Pesticide Disposal: Do not reuse or refill this container. If empty: Do not reuse this container. Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Text Label without graphics, pictures and illustrations

**Ritter's
Flea & Tick Spray**

FOR CATS – KITTENS – DOGS - PUPPIES - DOG HOUSES

For the control of Fleas, Ticks, and Lice on Dogs, Cats Over 12 Weeks Old, and
Horses

For temporarily repelling gnats, Mosquitoes, and Biting Flies

Active Ingredients:

Pyrethrins.....	0.15%
*Piperonyl Butoxide, Technical.....	1.50%
** (N-octyl bicycloheptene dicarboximide).....	0.50%
*** (Di-n-propyl isocinchomeronate).....	0.50%
**** Other Ingredients:	<u>97.35%</u>
Total:	100.00%

*Equivalent to 1.20% (butylcarbityl) (6-propylpiperonyl) ester and 0.30% related compounds

**MGK® 264 Insecticide Synergist

***MGK® Repellant 326

**** Inert ingredients include a grooming agent to ease combing and brushing out coat to remove dead fleas, ticks and lice.

CAUTION
Keep Out of Reach of Children

See side panel for additional Precautionary Statements

EPA Reg. No.: 49784-4
EPA Est. No.: 47258-TX-01

Net Contents: 16 FL. OZ. (473 ml)

Manufactured for:
Research Laboratories, Inc.
PO Box 801854
Houston, TX 77280-1854

Ritter's Flea & Tick Spray
EPA Reg. No. 49784-4
Label Version (4) dated May 12, 2009
Page 1 of 4

READ ENTIRE LABEL BEFORE EACH USE

FIRST AID	
If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-424-9300 or the National Pesticide Information Center at 1-800-858-7378.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

CAUTION: Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear long-sleeved shirt, long pants, shoes, socks, and chemical resistant gloves made of waterproof material. Users should wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash-water or rinsate. See Directions for Use and additional precautions and use restrictions.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Keep away from heat or open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY IN A WELL VENTILATED AREA. USE ON DOGS, PUPPIES, CATS AND KITTENS (OVER 12 WEEKS OLD) AND HORSES.

Read and follow all directions and precautions on this product label.

General Precautions and Use Restrictions

- Apply this product only as specified on this label.
- **DO NOT** apply this product around electrical equipment due to the possibility of shock hazard.
- Except when applying directly to pets, **DO NOT** allow adults, children or pets to enter treated area **until** sprays have dried.
- Remove pets, birds and cover fish aquariums before spraying.
- **DO NOT** apply to pets less than 12 weeks old.
- Avoid spraying of genital areas.
- **DO NOT** apply over cuts, wounds, or irritated skin.
- **DO NOT** apply near eyes and mouth. Apply sparingly around ears.
- **DO NOT** use on horses or foals intended for slaughter.
- Consult a veterinarian before applying this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals.
- Sensitivities may occur after using **ANY** pesticide for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Dogs and Cats: Cover animal's eyes with hand and with a firm fast stroke, to get proper spray mist. Spray head, ears, and chest until damp. With finger tips, rub into face, and around mouth, nose and eyes. Then spray neck, middle and hind quarters, finishing with legs last and paying special attention to the footpads (between toes) and underbody areas. Avoid spraying of genital areas. For best penetration of spray to the skin, direct spray against the lay of the hair. On long haired dogs rub your hand against the lay of the hair, spraying the ruffled hair directly behind the hand. Make sure spray thoroughly wets ticks. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week.

Puppies and Kittens: Do not use On puppies or kittens under 12 weeks old.

Treat same as for dogs and cats, except nursing puppies and kittens. Spray only along back or on your finger tips and rub in with your hands. Follow application with a complete brushing of the animal's hair to remove dead insects.

Pet's Indoor Sleeping Quarters:

Do not contaminate water, food or feed by use of this product.

For use in companion animal quarters only. Do not broadcast outdoors.

Remove animals from quarters before treating premises. Spray around baseboards, windows, door frames, wall cracks and local areas of floors. If mosquitoes, gnats, or lice are present, spray lightly into the air. Follow application with a complete brushing of the animal's hair to remove dead insects. Reapply treatment as necessary, but do not treat more than once per week. The bedding should be sprayed and then replaced with fresh bedding for best results. Allow all surfaces treated to dry before allowing pets to reoccupy.

Horses: To control stable flies, horse flies, deer flies and other face flies apply to face, legs, flanks, top line and other body areas commonly attacked by these flies. Reapply treatment as necessary, but do not treat more than once per week.

Storage and Disposal

Do not contaminate water, food or feed by storage and disposal.

Pesticide Storage: Store in original container, in a cool, dry place, inaccessible to children and pets. If a leaky container must be contained within another, mark the outer container to identify the contents. Do not store near heat or open flame. Store pesticides away from food, pet food, seed, fertilizers and veterinary supplies.

Pesticide Disposal: Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.